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June 16, 2022

**VIA E-FILING**

Jocelyn Boyd, Esquire  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
101 Executive Center Drive  
Columbia, SC 29210

RE: Application of Piedmont Natural Gas Company, Inc. for an Adjustment of Rates  
and Charges  
Docket No. 2022-89-G

Dear Ms. Boyd:

I have enclosed for filing the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record and requesting that each serve me with all outstanding motions or other pleadings, together with all discovery responses served to date and to be served.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/lbk  
Enclosures

cc: All parties of record (w/enc.)

**BEFORE**

**THE PUBLIC SERVICE COMMISSION OF**

**SOUTH CAROLINA**

**DOCKET NO. 2022-89-G**

IN RE:	)	
	)	
Application of Piedmont Natural Gas	)	
Company, Inc. for an Adjustment of Rates	)	<b>PETITION TO INTERVENE</b>
And Charges	)	

The South Carolina Energy Users Committee (“SCEUC”) hereby petitions the South Carolina Public Service Commission (“Commission”) pursuant to S.C. Code Ann. Reg 103-825 of the Commission’s rules and regulations to intervene and to be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That on April 1, 2022, Piedmont Natural Gas Company, Inc. (“PNG” or “Company”) filed an Application with the Commission pursuant to S.C. Code Ann. §§ 58-5-240 and S.C. Code Ann. Reg. 103-823(A)(3) seeking a rate increase and changes to certain terms and conditions of its gas service. PNG also elects to have the terms of the Natural Gas Rate Stabilization Act apply to its rates and charges.

2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State; SCEUC is organized for the purposes of intervening and participating in regulatory proceedings to advocate for cost based gas rates that are just and reasonable.

3. That members of SCEUC take gas service from PNG, consuming and purchasing substantial amounts of gas from the Company.

4. That SCEUC and its members have a real, material, and substantial interest in the subject matter to be addressed and resolved by the Commission in this docket as SCEUC members will suffer an adverse impact if obligated for payment of increased gas rates, charges, and tariffs; as a consequence, SCEUC's members will be aggrieved by an order by the Commission adjusting, changing, and increasing PNG's gas rates, charges, and tariffs.

5. That the interests of SCEUC's members are not adequately represented by the current parties to this proceeding.

6. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

7. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it and should be allowed so that a full and complete record addressing its views and concerns can be developed.

8. That in accordance with S.C. Code Ann. Reg. 103-804 (T) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.



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*Attorney for the South Carolina Energy  
Users Committee*

Columbia, South Carolina  
June 16, 2022

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them via Electronic Mail and return address clearly marked on the date indicated below:

RE: Application of Piedmont Natural Gas Company, Inc. for an Adjustment of Rates and Charges

DOCKET NO.: 2022-89-G

PARTIES SERVED:

**VIA ELECTONIC MAIL**

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PLEADING:

PETITION TO INTERVENE BY SOUTH CAROLINA  
ENERGY USERS COMMITTEE

June 16, 2022

  
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